

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION  
*This document relates to:*  
*Track Three Cases*

MDL 2804  
Case No. 17-md-2804  
Hon. Dan Aaron Polster

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**PLAINTIFFS LAKE AND TRUMBULL COUNTIES' CORRECTED RESPONSE TO  
DEFENDANTS' MOTION TO COMPEL**

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Plaintiffs Lake and Trumbull Counties submit the below corrected Trumbull County Estimated Annual Expenditure (2020, 2021). This is a correction to the chart identified in Docket No. 4277 at 25-26. The only correction is to a mathematical error in the last column of the chart "Total Opioid Related (2020 & 2021)" as explained further herein.

**TRUMBULL COUNTY'S SUBMISSION**

**I. Trumbull County's Estimated Annual Expenditure (2020, 2021)**

Provided in the chart below is the expenditure by each department for the two years (FY2020 and FY2021) which includes opioid related expenditures as well as non-opioid related expenditures. The County is not able to breakout with a high degree of specificity the opioid related vs the non-opioid related expenditures. Once again, the county, with the assistance of counsel, surveyed department employees to create a best estimate of the percentage of the total expenditures by department that were opioid related.

<b>Department</b>	<b>2020 Expenditure</b>	<b>2021 Expenditure</b>	<b>Estimated Percentage of Department Impacted by the Opioid Epidemic</b>	<b>Total Opioid Related (2020 &amp; 2021)</b>
Trumbull County Mental Health & Recovery Board (MHRB) <sup>1</sup>	\$7,565,095.00	\$7,414,060.07	85%	\$12,732,281.81
Trumbull County Job & Family Services/Children and Family Services	\$16,264,367.81	\$16,636,212.24	80%	\$26,320,464.04
Trumbull County Prosecutor's Office	\$3,011,997.71	\$3,090,894.92	75%	\$4,577,169.47
Trumbull County Public Defender's Office	\$419,368.00	\$140,857.00	85%	\$476,191.25
Trumbull County Court of Common Pleas	\$2,588,058.25	\$2,914,779.15	70%	\$3,851,986.18
Trumbull County Juvenile Court	\$4,542,479.69	\$5,074,092.26	20%	\$1,923,314.39
Trumbull County Sheriff's Office/Jail	\$12,132,004.11	\$13,609,594.61	40%	\$10,296,639.49
Trumbull County TAG	\$228,974.54	\$198,201.47	95%	\$405,817.21
Trumbull County Medical Examiner (Coroner's Office)	\$428,164.44	\$415,771.14	60%	\$506,361.35
Trumbull County Drug Court	\$8,502,338.78	\$8,441,093.11	95%	\$16,096,260.30
Trumbull County Family	\$59,658.54	\$60,243.17	85%	\$101,916.45

<sup>1</sup> There are various third-party providers that receive funding from the County that are not fully captured herein. Services they provide are funded by the County as well as other revenue sources such as grants and foundations. The funding which the county provides is inadequate to serve the needs of these providers. Abatement of the opioid epidemic will necessitate not only continued funding but also increased funding.

Department	2020 Expenditure	2021 Expenditure	Estimated Percentage of Department Impacted by the Opioid Epidemic	Total Opioid Related (2020 & 2021)
Dependency Treatment Court				
Trumbull County 911 Emergency Communications	\$3,335,805.64	\$2,873,205.07	30%	\$1,862,703.21
Trumbull County Probation Department	\$1,235,545.55	\$1,301,111.74	70%	\$1,775,660.10
<b>TOTAL</b>	\$60,313,858.06	\$62,170,115.95		\$80,926,765.25

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Hunter J. Shkolnik  
Hunter J. Shkolnik